

To: The Federal Communications Commission  
From: Nicholas P. Merrill

RE: Docket MM 99-325 (IBOC Digitalization)

I am filing this comment in support of THE VIRGINIA CENTER FOR THE PUBLIC PRESS. Like them, and others, I am opposed to implementation of In Band On Channel (IBOC) Digitalization. I am concerned that IBOC could displace many frequencies. IBOC could displace both aspiring stations and established stations as well.

I urge the Commission to proceed with the Eureka-147 alternative Digitalization technology, which would avoid the displacement problem. Even then, the Eureka-147 technology should first be tested and evaluated as thoroughly as the IBOC technology has been.

In no event should IBOC Digitalization be adopted without full and complete testing and evaluation of the less disruptive Eureka-147 Digitalization technology.

Sincerely,  
Nicholas P. Merrill